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 19 AMAZON.COM SERVICES LLC

20
 21 **UNITED STATES DISTRICT COURT**
 22 **DISTRICT OF NEVADA**

23 ESTEFANIA CORREA RESTREPO,
 24 Plaintiff,
 25 v.
 26 AMAZON.COM SERVICES LLC; DOES I-X,
 27 Defendant.

28 Case No. 2:25-cv-00119-RFB-DJA

**STIPULATION AND ~~PROPOSED~~
 ORDER TO EXTEND ALL DEADLINES
 (FIRST REQUEST)**

20 Pursuant to Local Rule IA 6-1 and Local Rule 26-3, Defendant AMAZON.COM
 21 SERVICES LLC (“Defendant”) and Plaintiff ESTEFANIA CORREA RESTREPO (“Plaintiff”)
 22 (collectively, the “Parties”) stipulate to amend the Discovery Plan and Scheduling Order (ECF
 23 No. 9) by extending all deadlines for a period of ninety (90) days.

24 This is the first request to extend all deadlines and Scheduling Order in this matter. The
 25 requested extension is sought in good faith and not for purposes of undue delay. This request is
 26 submitted at least twenty-one (21) days or more before the expiration of the subject deadlines.

27 **DISCOVERY COMPLETED**

28 The parties have each exchanged their initial disclosures and propounded written discovery.

DISCOVERY REMAINING TO BE COMPLETED

Conduct depositions. Propound additional discovery following depositions.

REASONS FOR REQUESTED EXTENSION

The parties participated in an ENE on July 1, 2025. The extension is necessary for the parties to have ample time to complete all appropriate discovery following the ENE.

PROPOSED REVISED DISCOVERY PLAN

1. Discovery Cut-Off Date:

The Parties' current deadline for completing discovery is **July 23, 2025**. The Parties request that the Court extend that deadline to **October 21, 2025**.

2. Dispositive Motions:

The Parties' current deadline to file dispositive motions is **August 22, 2025**. The Parties request that the Court extend that deadline to **November 20, 2025**.

3. Pretrial Order:

The Parties' current deadline for filing the Joint Pretrial Order is **September 22, 2025**. The Parties request that the Court extend that deadline to **December 22, 2025**. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the Court enters a ruling on the dispositive motions or otherwise by further order of the Court.

4. Fed. R. Civ. P. 26(a)(3) Disclosures:

The Parties' current deadline for disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections thereto with the Pretrial Order pursuant to LR 26-1(b)(6) in the Joint Pretrial Order is September 22, 2025. The Parties request that the Court extend that deadline to **December 22, 2025**.

5. Extensions or Modifications of the Discovery Plan and Scheduling Order:

In accordance with Local Rule 26-3, a stipulation or motion for modification or extension of this discovery plan and scheduling order must be made no later than twenty (21) days before the expiration of the subject deadline.

The Parties make this stipulation in good faith and not for the purposes of undue burden or delay.

1 Dated: July 2, 2025

2 /s/ Ruthann Devereaux-Gonzalez
3 Leon Greenberg, Esq.
4 Ruthann Devereaux-Gonzalez, Esq.
5 LEON GREENBERG PROFESSIONAL
6 CORPORATION

7 /s/ Ruthann Devereaux-Gonzalez
8 James P. Kemp, Esq.
9 KEMP & KEMP, ATTORNEYS AT LAW

10 *Attorneys for Plaintiff*
11 ESTEFANIA CORREA RESTREPO

Dated: July 2, 2025

12 /s/ Amanda Breemes
13 Z. Kathryn Branson, Esq.
14 Amanda Breemes (*Admitted Pro Hac*)
15 LITTLER MENDELSON, P.C.

16 *Attorneys for Defendant*
17 AMAZON.COM SERVICES LLC

18 **IT IS SO ORDERED.**

19 Dated: July 3, 2025

20 
21 UNITED STATES MAGISTRATE JUDGE